

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KENNETH HASSON, individually and on behalf of all others similarly situated, Plaintiff, v. COMCAST CABLE COMMUNICATIONS LLC, Defendant. This Document Relates to: All Actions	Master File No. 2:23-cv-05039-JMY
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------

**MAJORITY PLAINTIFFS' STATUS REPORT
IN RESPONSE TO CASE MANAGEMENT ORDER NO. 1**

Majority Plaintiffs, through undersigned proposed Interim Co-Lead Counsel Norman Siegel and Gary Lynch, provide this response to the Court's request for additional information as set forth in Case Management Order No. 1.

1. Status of Efforts to Self-Order Plaintiffs' Counsel:

As set forth in Majority Plaintiffs' Joint Application for Appointment of Co-Lead Counsel, Co-Liaison Counsel, and Plaintiffs' Executive Committee (Doc. 22), Mr. Siegel and Mr. Lynch have worked diligently and in good-faith to coordinate their litigation efforts for the benefit of the putative class. *See* Manual for Complex Litigation, Fourth ("MCL") §§ 10.22 (noting desirability of "the attorneys coordinat[ing] their activities without the court's assistance"), 10.272 (describing "private ordering" approach to leadership of consolidated actions). Those discussions resulted in several highly-qualified data breach lawyers stepping back from their stated desire to serve as lead counsel in this case, either to serve on the proposed Plaintiffs' Executive Committee, or in many

instances, agreeing to take no position at all. (*See* April 8, 2024 email to all plaintiffs’ counsel, attached hereto as Ex. A). All of these lawyers—representing 20 of the 24 cases on file—supported the leadership structure set forth in Majority Plaintiffs’ Motion. That left lawyers from the 4 remaining cases to file their own motions for leadership. *See* Docs. 20, 21, 23, and 24.

As directed by the court in Case Management Order No. 1, Mr. Siegel and Mr. Lynch returned to their efforts to confer with the remaining applicants on a consensus slate, and are pleased to report that Mr. Garber (Doc. 20); Mr. Leniski (Doc. 23); and Ms. Schubert (Doc 24) have all agreed to join Majority Plaintiffs’ Executive Committee.¹ Further, Erin Comite, who previously was proposed as Chair of the Executive Committee, has agreed to seek no position at all, for purposes of keeping the leadership structure streamlined. As a result, Majority Plaintiffs modify their request for appointment as follows:

Co-Lead Counsel:

- Gary F. Lynch, Lynch Carpenter, LLP; and
- Norman E. Siegel, Stueve Siegel Hanson LLP

Members of Plaintiffs’ Executive Committee:

- E. Michelle Drake, Berger Montague PC;
- Ryan J. Clarkson, Clarkson Law Firm;
- Amanda G. Fiorilla, Lowey Dannenberg, P.C.;
- Todd Garber, Finkelstein, Blankinship, Frei-Pearson & Garber, LLP;
- Joe Leniski, Herzfeld, Suetholz, Gastel, Leniski, and Wall PLLC;
- Rosemary M. Rivas, Gibbs Law Group LLP;
- Kevin Laukaitis, Laukaitis Law LLC;
- Matthew L. Lines, Isicoff Ragatz;

¹ On May 3, 2024, Mr. Siegel and Mr. Lynch conferred with John Macoretta of Spector Roseman and Kodroff, P.C., who declined to join Plaintiffs’ Executive Committee, and instead requested a Co-Lead position. Although Spector Roseman is certainly a qualified law firm, the firms making up the Majority Plaintiffs slate have unparalleled data breach experience and are likewise experienced in this District. Moreover, given the number of highly qualified firms that agreed to abandon their lead counsel applications to support efforts at a consensus slate, appointing Spector Roseman as a Co-Lead counsel would be inequitable under the circumstances. Majority Plaintiffs remain willing to include Mr. Macoretta as a member of the Executive Committee.

- Amber Schubert, Schubert Jonckheer & Kolbe LLP.

Co-Liaison Counsel:

- James A. Francis, Francis Soumilas Mailman, P.C.; and
- Charles E. Schaffer, Levin Sedran & Berman LLP.

As set forth in Majority Plaintiffs’ motion, this proposed group—now a near consensus with 23 of 24 cases in agreement—has significant nationwide data breach class action experience, knowledge of the applicable law, and substantial resources to zealously represent the proposed class. *See* Fed.R.Civ.P. 23(g). To summarize again here, the Majority Plaintiffs’ slate: 1) is comprised of a diverse group of nationally-recognized data breach attorneys, including several with strong connections to this Court and the local legal community; 2) was first to file this litigation; 3) led the efforts to have these cases centralized in the Eastern District of Pennsylvania, first by filing a JPML petition and then by coordinating Section 1404 transfers to this Court; 4) moved for the consolidation of this action before this Court (as ordered by Chief Judge Goldberg); 5) has been instrumental in developing the relevant legal precepts which will govern this litigation, including Pennsylvania’s common law negligence standard for data breaches and the Third Circuit’s Article III standing requirements for victims of a data breach; and 6) has spent substantial time and effort building what is now a near-consensus slate with the support of all but one case. A revised proposed Order reflecting the agreement of Majority Plaintiffs is attached as Ex. B.

Mr. Seigel and Mr. Lynch’s ability to achieve near-consensus for a plaintiffs’ leadership structure in a consolidated litigation involving so many attorneys demonstrates the reputation for honest-brokering and solid leadership that they have established with their peers in the data breach community. Mr. Seigel and Mr. Lynch personally know, and have previously worked with, nearly

every plaintiffs' counsel in this consolidated action.² They are uniquely positioned to lead this case on behalf of the plaintiffs and have a documented history of efficiently delegating and managing the work of other data breach lawyers. The leadership structure they are proposing is consistent with how other similarly-sized data breaches have been staffed.

2. Additional Case Management Issues:

The Court also indicated the following additional case management conference issues will be addressed at the conference: “the responsibilities of lead counsel, the allocation of tasks and responsibilities for non-lead counsel, expectations for maintaining expense and time records for any subsequent financial obligations, developing and proposing to the Court a schedule for commencement, execution, and completion of discovery, maintaining communications with defense counsel, preparing for future conferences and preparing for any report(s) pursuant to F.R.C.P. 16, and similar matters.”

With respect to the responsibilities of lead counsel and the allocation of tasks and responsibilities of non-lead counsel, Majority Plaintiffs respectfully submitted a Proposed Order Appointing Interim Class Counsel with their application for appointment of Interim Class Counsel. *See* Doc. 22-14. That Order—now modified and included here as Ex. B—includes detailed descriptions of responsibilities and workflows that would apply to provide structure to the Majority Plaintiffs' slate. Co-Lead Counsel would likewise be responsible for centralizing communications with defense counsel, and respectfully suggest that the Court hold status conferences approximately every 45 days, with joint agenda to be submitted seven days before each conference.

² While Mr. Seigel and Mr. Lynch have not yet had the opportunity to work with Mr. Macoretta, they are well-familiar with his law firm and their dealings with him in this matter have been extremely amicable.

In addition, proposed Co-Lead Counsel have evaluated the interests and skill sets of the members of the Executive Committee and intend to manage the case around four committees with the following members (*see* Proposed Order, Doc. 22-14 at ¶ 6):

Law and Briefing:

- Todd Garber, Finkelstein, Blankinship, Frei-Pearson & Garber, LLP
- Rosemary M. Rivas, Gibbs Law Group LLP
- Amber Schubert, Schubert Jonckheer & Kolbe LLP

Offensive Discovery:

- Joe Leniski, Herzfeld, Suetholz, Gastel, Leniski, and Wall PLLC
- Matthew L. Lines, Isicoff Ragatz

Defensive Discovery:

- Amanda G. Fiorilla, Lowey Dannenberg, P.C.
- Kevin Laukaitis, Laukaitis Law LLC

Experts:

- Ryan J. Clarkson, Clarkson Law Firm
- E. Michelle Drake, Berger Montague PC

Finally, in order to properly manage the time and expense of the litigation, proposed Co-Lead Counsel intend to impose a billing protocol for all Plaintiffs' counsel in the litigation. *See* Ex. C. This protocol has been used in numerous cases (including many data breach cases) and will ensure that the case is litigated consistent with Fed.R.Civ.P. 1. At the Court's request, proposed Co-Lead Counsel will submit summary billing reports every quarter so that the Court can independently monitor Plaintiffs' time.

3. Future Scheduling and Discovery:

In the Proposed Order, Majority Plaintiffs propose filing a Consolidated Complaint within 45 days of appointment. *See* Doc. 22-14 at ¶ 11. On May 8, 2024, proposed Co-Lead Counsel met

and conferred with counsel for Defendants and jointly propose the following schedule for the Court's consideration:

- Consolidated Complaint: 45 days from the appointment of Interim Class Counsel;
- Motions or Answer in response to Consolidated Complaint: 45 days from the filing of the Consolidated Complaint;
- Response to any Motion filed in response to the Consolidated Complaint: 45 days from the filing of any Motion.
- Reply in support of Motion in response to the Consolidated Complaint: 30 days from the filing of the Response to the Motion.

Finally, the Parties met and conferred regarding the commencement of discovery. Plaintiffs believe that discovery should commence with the filing of the Consolidated Complaint. Defendants' position is that discovery should not start until after the Court has decided any Motion filed in response to the Consolidated Complaint.

CONCLUSION

For the reasons stated herein and in their original Motion for Appointment, Plaintiffs respectfully request that the Court grant their joint application for leadership and enter the attached revised Order appointing Gary F. Lynch of Lynch Carpenter LLP and Norman E. Siegel of Stueve Siegel Hanson LLP as Co-Lead Counsel, creating a Plaintiffs' Executive Committee comprised of the nine members outlined above, and appointing James A. Francis of Francis Mailman Soumilas, P.C. and Charles E. Schaffer of Levin Sedran & Berman LLP as Co-Liaison Counsel.

Date: May 10, 2024

/s/ Gary F. Lynch

Gary F. Lynch (PA ID No. 56887)
Nicholas A. Colella (PA ID No. 332699)
Patrick D. Donathen (PA ID No. 330416)
Connor P. Hayes (PA ID No. 330447)
LYNCH CARPENTER LLP
1133 Penn Avenue, 5th Floor
Pittsburgh, PA 15222
Telephone: (412) 322-9243
gary@lcllp.com
nickc@lcllp.com
patrick@lcllp.com
connorh@lcllp.com

MaryBeth V. Gibson*
**GIBSON CONSUMER LAW
GROUP, LLC**
4729 Roswell Rd.
Suite 208-108
Atlanta, Georgia 30342
T: (678) 642-2503
marybeth@gibsonconsumerlawgroup.com

Counsel for Plaintiff Kenneth Hasson

/s/ Norman E. Siegel

Norman E. Siegel*
J. Austin Moore*
Stefon J. David*
STUEVE SIEGEL HANSON LLP
460 Nichols Road, Suite 200
Kansas City, Missouri 64112
Telephone: (816) 714-7100
siegel@stuevesiegel.com
moore@stuevesiegel.com
david@stuevesiegel.com

Charles E. Schaffer
Nicholas J. Elia
LEVIN SEDRAN & BERMAN LLP
510 Walnut Street, Suite 500
Philadelphia, PA 19106
Phone: (215) 592-1500
cschaffer@lfsblaw.com
nelia@lfsblaw.com

Counsel for Plaintiff Robert Smith

Charles E. Schaffer
Nicholas J. Elia
LEVIN SEDRAN & BERMAN LLP
510 Walnut Street, Suite 500
Philadelphia, PA 19106
Phone: (215) 592-1500
cschaffer@lfsblaw.com
nelia@lfsblaw.com

Jeffrey S. Goldenberg*
Todd B. Naylor*
GOLDENBERG SCHNEIDER, LPA
4445 Lake Forest Drive, Suite 490
Cincinnati, Ohio 45242
Phone: (513) 345-8291
Facsimile: (513) 345-8294
jgoldenberg@gs-legal.com
tnaylor@gs-legal.com

Jeffrey K. Brown, Esq.
Andrew Costello, Esq.
LEEDS BROWN LAW, P.C
One Old Country Road, Suite 347
Carle Place, NY 11514
Tel: (516) 873-9550
jbrown@leedsbrownlaw.com
acostello@leedsbrownlaw.com

*Counsel for Plaintiffs Patricia Andros and
Ronald Simmont*

Charles E. Schaffer
Nicholas J. Elia
LEVIN SEDRAN & BERMAN LLP
510 Walnut Street, Suite 500
Philadelphia, PA 19106
Phone: (215) 592-1500
cschaffer@lfsblaw.com
nelia@lfsblaw.com

Rosemary M. Rivas*
GIBBS LAW GROUP LLP
1111 Broadway, Suite 2100
Oakland, California 94607
Telephone: (510) 350-9700
Facsimile: (510) 350-9701
Email: rmr@classlawgroup.com

*Counsel for Plaintiffs Michelle Birnie,
Charolet W. Fail, and Lauren Wilkinson*

Jay Eng*
Patrick T. Egan*
Christina L. Gregg*
BERMAN TABACCO
One Liberty Square Boston, MA 02109
Telephone: (617) 542-8300
jeng@bermantabacco.com
pegan@bermantabacco.com
cgregg@bermantabacco.com

Counsel for Plaintiff Jessica Carey

David M. Buckner*
BUCKNER + MILES
2020 Salzedo Street, Suite 302
Coral Gables, Florida 33134
Telephone: 305.964.8003
Facsimile: 786.523.0485
david@bucknermiles.com

James A. Barry, Esq.*
POGUST GOODHEAD LLC
505 S. Lenola Rd., Suite 126
Moorestown, NJ 08057
jbarry@pogustgoodhead.com
Telephone: (610) 941-4204

Meghan J. Talbot, Esq. (PA No. 322308)
161 Washington St., Ste. 250
Conshohocken, PA 19428
mtalbot@pogustgoodhead.com
Telephone: (610) 941-4204

Michael A. Galpern, Esq.*
**JAVERBAUM WURGAFT HICKS
KAHN WIKSTROM & SININS, P.C.**
1000 Haddonfield-Berlin Road, Suite 203
Voorhees, NJ 08043
Telephone: (856) 596-4100
mgalpern@lawjw.com

Counsel for Plaintiff Michelle Clark

Matthew Lines*
Eric D. Isicoff*
Teresa Ragatz*
Jordan D. Isicoff*
ISICOFF RAGATZ
601 Brickell Key Drive, Suite 750
Miami, Florida 33131
Tel: (305) 373-3232
Fax: (305) 373-3233
Isicoff@irlaw.com
Ragatz@irlaw.com
Lines@irlaw.com
Jordan@irlaw.com

*Counsel for Plaintiffs H. Joshua Diamond,
Lori Zinn, Robert P. Elson*

Charles E. Schaffer
LEVIN SEDRAN & BERMAN LLP
510 Walnut Street, Suite 500
Philadelphia, PA 19106
Phone: (215) 592-1500
cschaffer@lfsblaw.com

Joseph Guglielmo*
**SCOTT+SCOTT ATTORNEYS AT
LAW LLP**
The Helmsley Building
230 Park Avenue, 17th Floor
New York, NY 10169
Tel.: (212) 223-6444
Fax: (212) 223-6334
jguglielmo@scott-scott.com

Erin Green Comite*
**SCOTT+SCOTT ATTORNEYS AT
LAW LLP**
156 South Main Street
P.O. Box 192
Colchester, CT 06415
Tel.: (860) 537-5537
Fax: (860) 537-4432
ecomite@scott-scott.com

Counsel for Plaintiff Jessica Durham

Mark B. DeSanto (Pa. ID No. 320310)
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Tel: (215) 875-3046
mdesanto@bm.net

E. Michelle Drake*
BERGER MONTAGUE PC
1229 Tyler Street NE, Suite 205
Minneapolis, MN 55413
Tel: (612) 594-5933
emdrake@bm.net

Karen H. Riebel*
Kate M. Baxter-Kauf*
Maureen Kane Berg*
Emma Ritter Gordon*
LOCKRIDGE GRINDAL NAUEN PLLP
100 Washington Ave S., Suite 2200
Minneapolis, MN 55401
Tel: (612) 339-6900
khriegel@locklaw.com
kmbaxter-kauf@locklaw.com
mkberg@locklaw.com
erittergordon@locklaw.com

David E. Wynne*
DURDINE WYNNE LLP
Wedge International Tower
1415 Louisiana, Suite 3900
Houston, TX 77002
Tel: (713) 227-8835
dwyne@burdinewynne.com

Counsel for Plaintiff Vince Estevez

Jeff Ostrow*
Steven Sukert*
**KOPELOWITZ OSTROW FERGUSON
WEISELBERG GILBERT**
One West Las Olas Blvd., Suite 500 Ft.
Lauderdale, Florida 33301
Telephone No.: (954) 525-4100
ostrow@kolawyers.com
sukert@kolawyers.com

Alan M. Feldman
Zachary Arbitman
Samuel Mukiibi
**FELDMAN SHEPHERD
WOHLGELERNTER
TANNER WEINSTOCK & DODIG, LLP**
1845 Walnut Street, 21st Floor
Philadelphia, PA 19103
T: (215) 567-8300
F: (215) 567-8333
afeldman@feldmanshepherd.com
zarbitman@feldmanshepherd.com
smukiibi@feldmanshepherd.com

Counsel for Plaintiff Raymond Goodrow

Kevin Laukaitis (Pa. ID No. 321670)
LAUKAITIS LAW LLC
954 Avenida Ponce De Leon Suite 205,
#10518
San Juan, PR 00907
T: (215) 789-4462
klaukaitis@laukaitislaw.com

Counsel for Plaintiff Danielle Hendrickson

Ian W. Sloss*
Johnathan Seredynski*
SILVER GOLUB & TEITELL LLP
One Landmark Square, Floor 15
Stamford, CT 06901
Telephone: (203) 325-4491
isloss@sgtlaw.com
jseredynski@sgtlaw.com

Christian Levis*
Amanda G. Fiorilla*
LOWEY DANNENBERG, P.C.
44 South Broadway, Suite 1100
White Plains, NY 10601
Telephone: (914) 997-0500
clevis@lowey.com
afiorilla@lowey.com

Anthony M. Christina (Pa. ID No. 322528)
LOWEY DANNENBERG, P.C.
One Tower Bridge
100 Front Street, Suite 520
West Conshohocken, PA
Telephone: (215) 399-4770
achristina@lowey.com

Counsel for Plaintiff Jacqueline Keung

Todd S. Garber*
Andrew C. White*
**FINKELSTEIN, BLANKINSHIP FREI-
PEARSON & GARBER, LLP**
One North Broadway, Suite 900
White Plains, New York 10601
Tel: (914) 298-3281
tgarber@fbfglaw.com
awhite@fbfglaw.com

Paul M. Sod*
LAW OFFICES OF PAUL M. SOD
337R Central Avenue
Lawrence, New York 11559
Tel: (516) 295-0707
paulmsod@gmail.com

Christian Levis*
Amanda G. Fiorilla*
LOWEY DANNENBERG, P.C.
44 South Broadway, Suite 1100
White Plains, NY 10601
Telephone: (914) 997-0500
clevis@lowey.com
afiorilla@lowey.com

Anthony M. Christina (Pa. ID No. 322528)
LOWEY DANNENBERG, P.C.
One Tower Bridge
100 Front Street, Suite 520
West Conshohocken, PA
Telephone: (215) 399-4770
achristina@lowey.com

*Counsel for Plaintiffs David McCauley and
Jodi Wolfson*

James A. Francis (Pa. ID No. 77474)
Jordan M. Sartell*
FRANCIS MAILMAN SOUMILAS, P.C.
1600 Market Street, Suite 2510
Philadelphia, PA 19103
Tel. (215) 735-8600
Fax (215) 940-8000
jfrancis@consumerlawfirm.com
jsartell@consumerlawfirm.com

Edward W. Ciolko*
Jennifer S. Czeisler*
STERLINGTON, PLLC
One World Trade Center
285 Fulton St. 85th Floor
New York, New York 10007
Tel. (212) 433-2993
jen.czeisler@sterlingtonlaw.com
edward.ciolko@sterlingtonlaw.com

James M. Evangelista*
EVANGELISTA WORLEY LLC
500 Sugar Mill Road Suit 245A
Atlanta, GA 30350
Tel: (404) 205-8400
Fax: (404) 205-8395
jim@ewlawllc.com

*Counsel for Plaintiffs Centoria Gunther and
Alyssia Nanez*

William Wright*
THE WRIGHT LAW OFFICE, P.A.
515 N. Flagler Drive P300
West Palm Beach, FL 33401
willwright@wrightlawoffice.com
561-514-0904

Marc E. Dann*
Brian D. Flick*
DANNLAW
15000 Madison Avenue
Lakewood, OH 44107
Phone: (216) 373-0539
Facsimile: (216) 373-0536
notices@dannlaw.com

Thomas A. Zimmerman, Jr.*
ZIMMERMAN LAW OFFICES
77 W. Washington Street, Suite 1220
Chicago, Illinois 60602
Phone: (312) 440-0020
Fax: (312) 440-4180
tom@attorneyzim.com

Counsel for Plaintiff Charles Metzger

Bryan Paul Thompson
Robert W. Harrer
**CHICAGO CONSUMER LAW
CENTER, P.C.**
650 Warrenville Road, Suite 100
Lisle, IL 60532
Tel. 312-858-3239
Fax 312-610-5646
bryan.thompson@cclc-law.com
rob.harrer@cclc-law.com

Counsel for Plaintiff Enrique Munoz

Alexandra Warren*
Charles J. LaDuca*
Brendan Thompson*
CUNEO GILBERT & LADUCA, LLP
4725 Wisconsin Avenue NW Suite 200
Washington, DC 20016
(202) 789-3960
awarren@cuneolaw.com
charles@cuneolaw.com
brendant@cuneolaw.com

Charles Barrett*
Daniella Bhadare-Valente*
Morgan L. Burkett*
NEAL & HARWELL, PLC
1201 Demonbreun St. Suite 1000
Nashville, TN 37203
(615) 244-1713
cbarrett@nealharwell.com
dbhadare-valente@nealharwell.com
mburkett@nealharwell.com

Counsel for Alexander Nunn

Gary F. Lynch (Pa. ID No. 56887)
LYNCH CARPENTER LLP
1133 Penn Avenue, 5th Floor
Pittsburgh, PA 15222
Telephone: (412) 322-9243
gary@lcllp.com

Ryan J. Clarkson*
Glenn Danas*
Yana Hart*
CLARKSON LAW FIRM, P.C.
22525 Pacific Coast Highway
Malibu, CA 90265
Tel: (213) 788-4050
rclarkson@clarksonlawfirm.com
gdanas@clarksonlawfirm.com
yhart@clarksonlawfirm.com

Hassan A. Zavareei*
TYCKO & ZAVAREEI LLP
1828 L Street NW, Ste. 1000
Washington, DC 20036
Tel: (202) 973-973-0900
Email: hzavareei@tzlegal.com

Counsel for Plaintiff Steven Prescott

Amber L. Schubert*
**SCHUBERT JONCKHEER & KOLBE
LLP**
2001 Union Street, Suite 200
San Francisco, CA 94123
Tel: (415) 788-4220
aschubert@sjk.law

Christian Levis*
Amanda G. Fiorilla*
LOWEY DANNENBERG, P.C.
44 South Broadway, Suite 1100
White Plains, NY 10601
Telephone: (914) 997-0500
clevis@lowey.com
afiorilla@lowey.com

Anthony M. Christina (Pa. ID No. 322528)
LOWEY DANNENBERG, P.C.
One Tower Bridge
100 Front Street, Suite 520
West Conshohocken, PA
Telephone: (215) 399-4770
achristina@lowey.com

*Counsel for Plaintiffs Jacklyn Remark and
Noah Birkett*

Kevin Laukaitis (PA ID 321670)
LAUKAITIS LAW LLC
954 Avenida Ponce De Leon Suite 205,
#10518
San Juan, PR 00907
T: (215) 789-4462
klauskaitis@laukaitislaw.com

A. Brooke Murphy*
MURPHY LAW FIRM
4116 Will Rogers Pkwy, Suite 700
Oklahoma City, OK 73108
Tel: (405) 389-4989
abm@murphylegalfirm.com

Counsel for Plaintiff Veronica Verdier

Patrick Howard (PA ID No. 88572) **SALTZ
MONGELUZZI & BENDESKY** 1650
Market Street, 52nd Floor Philadelphia, PA
19103
Tel: (215) 575-3895
phoward@smbb.com

Joe P. Leniski, Jr.*
**HERZFELD, SUETHOLZ, GASTEL,
LENISKI & WALL, PLLC**
223 Rosa L. Parks Avenue, Suite 300
Nashville, Tennessee 37203
Tel: (615) 800-6225
joey@hsglawgroup.com

Peter J. Jannace*
**HERZFELD, SUETHOLZ, GASTEL,
LENISKI & WALL, PLLC**
515 Park Avenue
Louisville, Kentucky 40208
Tel: (502) 636-4333
peter@hsglawgroup.com

Counsel for Plaintiff Ralf Werner

Mark B. DeSanto (PA ID No. 320310)
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Tel: (215) 875-3046
mdesanto@bm.net

E. Michelle Drake*
BERGER MONTAGUE PC
1229 Tyler Street NE, Suite 205
Minneapolis, MN 55413
Tel: (612) 594-5933
emdrape@bm.net

Counsel for Plaintiff Laura Wiley

Steven A. Schwartz (PA ID No. 50579)
Marissa N. Pembroke (PA ID No. 330494)
**CHIMICLES SCHWARTZ KRINER &
DONALDSON-SMITH LLP**
361 W. Lancaster Avenue
Haverford, PA 19041
Telephone: (610) 642-8500
sas@chimicles.com
mnp@chimicles.com

Juliana Del Pesco (PA ID No. 326725)
**CHIMICLES SCHWARTZ KRINER &
DONALDSON-SMITH LLP**
2711 Centerville Road Suite 201
Wilmington, DE 19808
Telephone: (302) 656-2500
jdp@chimicles.com

Counsel for Plaintiff Marcia P. Wilson

Lee Albert (PA ID # 046852)
GLANCY PRONGAY & MURRAY LLP
230 Park Avenue, Suite 358
New York, NY 10169
Tel: (212) 682-5340
Fax: (212) 884-0988
lalbert@glancylaw.com

Counsel for Plaintiff Joseph Zagacki

**pro hac vice*